

FILED

IN THE CHANCERY COURT OF PEARL RIVER COUNTY, MISSISSIPPI
APR 21 2017

IN THE MATTER OF THE ESTATE
OF JAMES R. RAINE, DECEASED

MELINDA SMITH BOWMAN CHANCERY CLERK
BY Brittany Spivey D.C.

BY:

CAUSE NO. 17-PR-76-G

ENOCH C. RAINE and
ANGELA FOWLER

PETITIONERS

**PETITION TO OPEN INTESTATE ESTATE,
FOR APPOINTMENT OF ADMINISTRATORS
AND ISSUANCE OF LETTERS OF ADMINISTRATION**

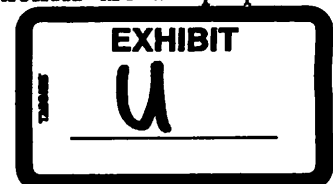
COMES NOW Enoch C. Raine and Angela Fowler, the petitioners named in the above styled and numbered cause, who are adult resident citizens of Poplarville, Pearl River County, Mississippi, and files this their Petition seeking their appointment as Administrators of the Estate of James R. Raine, Deceased, and for issuance of Letters of Administration over the Estate of said decedent, and as for cause, would respectfully represent and show unto this Honorable Court the following facts, to-wit:

I.

That James R. Raine, deceased, departed this life intestate in Poplarville, Pearl River County, Mississippi on or about October 21, 2011. At the time of his death he was an actual adult bona fide resident citizen of Pearl River County, Poplarville, Mississippi.

II.

That your petitioners, Enoch Raine and Angela Fowler, are the brother and sister of said decedent and desires to be appointed Administrators of the estate of said decedent; that said decedent's estate should be administered immediately and that the petitioners are the proper



persons to be appointed Administrators thereof and is not disqualified by law or otherwise from serving and performing in this capacity.

III.

That your petitioners would show unto this Honorable Court that the decedent at the time of his death was married to Emma Smith Raine and they had no children however, James R. Raine had one child that the Petitioners know of said child being, Jⁿ R. a minor, approximately 18 years old. The heirs of the decedent should be determined at a later date in these proceedings.

IV.

It is believed that the decedent died seized and possessed of certain real property in Warren County, Mississippi and personal property located in Pearl River County, Mississippi. The personal property assets of said estate are such that an inventory of said estate or appraisal thereof is unnecessary at this time and that the same should be dispensed with until such time as the Court may deem the same to be necessary for the benefit of said estate.

V.

As of the date of the filing of this Petition, no estate, intestate or otherwise, concerning James R. Raine has been opened or applied for in this Court. The Petitioners are not aware of the existence of Last Will and Testament for the decedent and alleges that James R. Raine died intestate.

VI.

On or about October 21, 2011 James R. Raine was shot and killed in Pearl River County, Poplarville, Mississippi. The petitioners allege that Emma Smith Raine is a suspect in said shooting and brought about the death of the decedent. She is presently serving time in prison for

the death of a previous husband and is not otherwise qualified to serve as administrator of this estate.

VII.

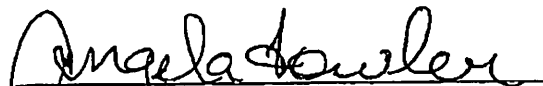
The Petitioners have reason to believe that there is a policy or policies of life insurance coverage that was taken out on the deceased and that said policy or policies have not been paid and seek to open their brother's estate for authority to investigate the existence of any life insurance policies and to proceed with filing a claim on behalf of the estate of James R. Raine, deceased.

WHEREFORE, PREMISES CONSIDERED, petitioners pray that this Court will grant Letters of Administration to them upon and over the estate of James R. Raine, deceased, upon their taking the oath as prescribed by law and upon posting a proper bond as this Court may deem suitable in these premises, further that an accounting an inventory be waived at this time until further directed by the Court.

Petitioners pray for such other further and additional relief, as this Court deems just and equitable in these premises, for in duty bound your petitioners shall forever pray.

Respectfully submitted,


ENOCH RAINE, PETITIONER


ANGELA FOWLER, PETITIONER

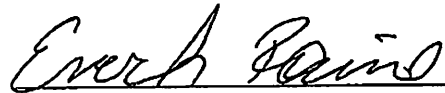

CHARLES E. LAWRENCE, JR.
ATTORNEY AT LAW

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STATE OF MISSISSIPPI

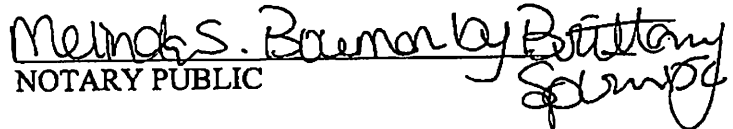
COUNTY OF FORREST

PERSONALLY CAME AND APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, the within named, Enoch Raine and Angela Fowler, personally known to me or proven to me by sufficient photo identification, who, after being sworn on her oath, state that she is the petitioners and heir at law, respectively of JAMES R. RAINE, deceased, and that all matters, facts and things contained in this Petition for Appointment of Administration are true and correct as set forth therein according to your affiant's best information and belief.


ENOCH RAINE


ANGELA FOWLER

SWORN TO AND SUBSCRIBED BEFORE ME, this the 21 day of April, A.D., 2017.


NOTARY PUBLIC

MY COMMISSION EXPIRES:

01/01/2020